

KEVIN G. HORBATIUK (KGH-4977)  
MATTHEW P. MAZZOLA (MM-7427)  
RUSSO, KEANE & TONER, LLP  
Attorneys for Defendant  
**CUNNINGHAM DUCT WORK s/h/i/a**  
**CUNNINGHAM DUCT CLEANING CO., INC.**  
26 Broadway - 28th Floor  
New York, New York 10004  
(212) 482-0001

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
**IN RE COMBINED WORLD TRADE CENTER  
AND LOWER MANHATTAN DISASTER SITE  
LITIGATION**  
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**21 MC 102 (AKH)**

**FERNANDA SANTOS,**

**DOCKET NO:  
07 CV 05319**

**Plaintiff,**

**-against-**

**100 CHURCH, LLC, AMBIENT GROUP, INC.,  
AMERICAN EXPRESS BANK, LTD., AMERICAN  
EXPRESS COMPANY, AMERICAN EXPRESS  
TRAVEL RELATED SERVICES COMPANY, INC.,  
BATTERY PARK CITY AUTHORITY, BFP ONE  
LIBERTY PLAZA CO., LLC, BFP TOWER  
C CO., LLC, BFP TOWER C MM LLC  
BLACKMON-MOORING STEAMATIC  
CATASTROPHE, INC., d/b/a BMS CAT, BROOKFIELD  
FINANCIAL PROPERTIES, INC., BROOKFIELD  
FINANCIAL PROPERTIES, L.P, BROOKFIELD  
PARTNERS, L.P., BROOKFIELD PROPERTIES  
CORPORATION, BROOKFIELD PROPERTIES  
HOLDINGS, INC., CUNNINGHAM DUCT  
CLEANING CO., DEPARTMENT OF  
BUSINESS SERVICES, ENVIRONMENTAL  
CONSULTANTS, INC., HILLMAN ENVIRONMENTAL  
GROUP, LLC, HUDSON VIEW EAST  
CONDOMINIUM, HUDSON VIEW TOWER  
ASSOCIATES, INDOOR AIR PROFESSIONALS, INC.,  
INDOOR ENVIRONMENTAL TECHNOLOGY, INC.,  
LAW ENGINEERING, P.C., LEHMAN BROTHERS  
HOLDINGS, INC., LEHMAN BROTHERS, INC.,**

**NOTICE OF  
ADOPTION OF  
ANSWER TO  
MASTER COMPLAINT**

**BEHMAN COMMERCIAL PAPER, INC., MERRILL  
LYNCH & CO., INC., NEW YORK  
CITY SCHOOL CONSTRUCTION,  
AUTHORITY, ONE WALL STREET  
HOLDINGS, LLC., R Y MANAGEMENT, CO.,  
ROYAL AND SUN ALLIANCE INSURANCE  
GROUP., PLC, RY MANAGEMENT, THE  
BANK OF NEW YORK COMPANY, INC.,  
TRAMMELL CROW COMPANY, TRAMMELL  
CROW CORORATE SERVICES, INC.,TRC  
ENGINEERS, INC., TUCKER ANTHONY, INC.,  
VERIZON NEW YORK, INC., WFP RETAIL  
CO., G.P., CORP., WFP RETAIL  
CO., L.P., WFP TOWER A CO., WFP TOWER A  
CO., G.P., CORP., WFP TOWER A COP., L.P.,  
AND ZAR REALTY MANAGEMENT CORP., ET AL.**

**Defendants.**

.....X  
**PLEASE TAKE NOTICE**, that defendant **CUNNINGHAM DUCT WORK s/h/i/a  
CUNNINGHAM DUCT CLEANING CO., INC.** ("CUNNINGHAM"), by its attorneys, RUSSO,  
KEANE & TONER, LLP, as and for its Response to the allegations set forth in the Complaint by  
Adoption (Check-Off-Complaint) Related to the Master Complaint filed in the above referenced  
action, hereby adopt their Answer to Master Complaint dated, August 1, 2007, which was filed in  
the matter of *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102  
(AKH).

**WHEREFORE**, the defendant, CUNNINGHAM demands judgment dismissing the above  
captioned caption action as against it, together with its costs and disbursements and for such other  
and further relief as this Court deems just and proper.

Dated: New York, New York  
April 30, 2008

Kevin G. Horbatiuk  
Kevin G. Horbatiuk (KGH4977)  
Matthew P. Mazzola (MM-7427)  
Attorneys for Defendant  
**CUNNINGHAM DUCT WORK s/h/i/a  
CUNNINGHAM DUCT CLEANING CO., INC.**  
RUSSO, KEANE & TONER, LLP  
26 Broadway, 28th Floor  
New York, New York 10004  
(212) 482-0001

TO: CHRISTOPHER R. LaPOLA, ESQ.,  
WORBY GRONER EDELMAN & NAPOLI BERN, LLP  
Attorney for Plaintiff  
**FERNANDA SANTOS**  
115 Broadway 12th Floor  
New York, New York 10006  
(212) 267-3700

**CERTIFICATION OF SERVICE**

I hereby certify that a copy of the above and foregoing has been served upon the following listed person by placing a copy of the same in the United States mail, postage prepared and properly addressed, this the 30<sup>th</sup> day of April, 2008.

CHRISTOPHER R. LaPOLA, ESQ.,  
WORBY GRONER EDELMAN & NAPOLI BERN, LLP  
Attorney for Plaintiff  
**FERNANDA SANTOS**  
115 Broadway 12th Floor  
New York, New York 10006

  
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KEVIN G. HORBATIUK